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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AMERIPRIDE SERVICES INC.,)	Case No. 2:00-cv-00113-MCE-EFB
Plaintiffs,)	
vs.)	JOINT REQUEST AND ORDER TO
)	INCREASE THE PAGE LIMITATION ON
VALLEY INDUSTRIAL SERVICES, INC.,)	DISPOSITIVE MOTIONS AND RELATED
a former California corporation, et al.,)	OPPOSITIONS AND REPLIES
Defendants.)	
)	Judge: Hon. Morrison C. England
)	Trial Date: August 5, 2016
)	MSJ Filing Deadline: February 25, 2016

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1 Plaintiff AMERIPRIDE SERVICES INC. (“AmeriPride”) and Defendant TEXAS
2 EASTERN OVERSEAS, INC. (“TEO”), by and through their respective counsel,
3 respectfully submit this joint request for relief from the Court’s page limitations on
4 dispositive motions and the related oppositions and replies.

5 Pursuant to the Court’s July 20, 2015 Pretrial Scheduling Order, “[t]he Court
6 places a page limit for points and authorities (exclusive of exhibits and other supporting
7 documentation) of twenty (20) pages on all initial moving papers, twenty (20) pages on
8 oppositions, and ten (10) pages for replies. All requests for page limit increases must
9 be made in writing to the Court setting forth any and all reasons for any increase in
10 page limit at least fourteen (14) days prior to the filing of the motion.” Absent a Court
11 order, the parties must include all of their summary judgment issues in one motion or
12 cross-motion. Dkt. 988 at 5-6.¹

13 The Parties respectfully request the following page limit increases: (1) twenty-
14 seven (27) pages for initial moving papers; (2) twenty-seven (27) pages for oppositions;
15 and (3) eighteen (18) pages for replies.

16 Good cause exists to grant the Parties’ request to exceed the page limit. The
17 Court’s July 20, 2015 Order states that “all purely legal issues are to be resolved by
18 timely pretrial motions.” Dkt. 988, 5:18. There are purely legal issues in dispute
19 between the Parties relating to all three of the remanded issues from the Ninth Circuit
20 Court of Appeals. AmeriPride Services, Inc. v. Texas Eastern Overseas, Inc., 782 F. 3d
21 479, 492 (9th Cir. 2015). The Parties also intend to move on issues involving mixed
22 questions of fact and law where they think the material facts are undisputed.

23 TEO contends that the legal issues are numerous, and many of them complex.

24 By granting the Parties’ request for additional pages, each of the legal issues in
25 dispute and other issues capable of resolution on summary judgment can be adequately
26 and meaningfully briefed for the Court. The result will be enhanced judicial economy.

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28 ¹ “Dkt.” refers to the Court’s ECF Docket number for this case.

1 The Parties will have a full opportunity to resolve as many issues as possible through
2 their dispositive motions, which will streamline the Parties' presentation of evidence and
3 witnesses to the Court at the one-day trial set for August 5, 2016. Further, even if an
4 issue is not entirely resolved by dispositive motion, the Court will have the benefit of the
5 Parties' full briefing of each issue, which may help orient and familiarize the Court with
6 the outstanding disputes prior to the one-day trial.

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9 Date: February 4, 2016

BASSI, EDLIN, HUIE & BLUM LLP

10 By: */s/ Erin K. Poppler*

11 _____
12 FRED M. BLUM
13 ERIN K. POPPLER
14 Attorneys for Defendant
15 TEXAS EASTERN OVERSEAS, INC.

16
17
18 Date: February 4, 2016

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1 Date: February 4, 2016

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3 By: /s/ Brian L. Zagon

4 PHILIP C. HUNSUCKER
5 BRIAN L. ZAGON
6 Attorneys for Plaintiffs
7 AMERIPRIDE SERVICES INC.

8 Date: February 4, 2016

PERKINS MANN & EVERETT, APC

9 By: /s/ Lee N. Smith

10 LEE N. SMITH
11 Attorneys for Plaintiffs
12 AMERIPRIDE SERVICES INC.

13
14 **ORDER**

15 The foregoing Joint Request is GRANTED. The memorandum of points and
16 authorities in support of dispositive motions, and any oppositions thereto, shall not
17 exceed twenty-seven (27) pages. Associated reply briefs shall not exceed eighteen
18 (18) pages.

19 IT IS SO ORDERED.

20 Dated: February 10, 2016

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24 MORRISON C. ENGLAND, JR., CHIEF JUDGE
25 UNITED STATES DISTRICT COURT
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